

27.085 County
Ray Schumann & Associates

JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

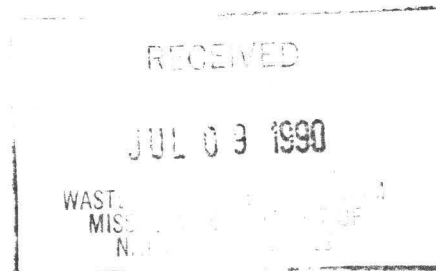
DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office
8460 Watson Road, Suite 217
St. Louis, MO 63119
314-849-1313

WMP
Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

June 29, 1990

Mr. James A. Schumann
Ray Schumann & Associates
1347 January Avenue
St. Louis, MO 63110



Dear Mr. Schumann:

On June 25, 1990, a Resource Conservation and Recovery Act and Missouri Hazardous Waste Management Law Compliance Evaluation Inspection was conducted at Ray Schumann & Associates at 1347 January Avenue, St. Louis, Missouri, 63110. The inspection was conducted by Mr. Dan Bennett, Environmental Specialist, Missouri Department of Natural Resources, St. Louis Regional Office. A small quantity generator and resource recovery inspection was conducted

The inspection was conducted under the authority of the Resource Conservation and Recovery Act on Sections 260.375(9) and 260.377 of the Missouri Hazardous Waste Management Law.

No violations were observed during the inspection and no response is required from you.

If you have any questions, please contact Mr. Bennett at (314) 849-1313.

Sincerely,

ST. LOUIS REGIONAL OFFICE

Robert S. P. Eck
Regional Administrator

RSPE/DB:ps



R00129140
RCRA RECORDS CENTER

LAND-DISPOSAL RESTRICTIONS CHECKLIST FOR F-SOLVENT AND DIOXIN WASTES

Facility: Ray Schumann Assoc
1347 January Ave
St. Louis MO 63110

Date: June 25, 1990 TREATMENT/STORAGE FACILITY REQUIREMENTS

Facility Representative: James Schuman EPA I.D.#: MO0009738147

Title: Plant Manager

Phone #: 314/645-8700

Facility Status: ☐ Large Quantity Generator
☒ Small Quantity Generator
☐ Treatment/Storage Facility
☐ Land Disposal Facility
☐ Permitted

A. GENERAL

1. Specify the wastes handled by the facility which are subject to the land disposal restrictions:

EPA Waste Code (FOU1)	Waste Description
<u>FOU2/FOU3</u>	<u>Perchloroethylene</u>
<u></u>	<u>Butyl Alcohol</u>
<u></u>	<u></u>
<u></u>	<u></u>

Are these wastes properly classified? Yes ☒ No ☐

2. Which, if any, of the following exemptions or extensions apply to this facility?

- Two-year national capacity extension of the effective date for solvent wastes generated by small quantity generators (268.30) ☐
- Two-year statutory exemption for solvent wastes generated from RCRA corrective or CERCLA Section 104 and 106 response actions (268.30) ☐
- Two-year national capacity extension of the effective date for solvent-water mixtures, solvent-containing sludges, or solvent-containing soil (non-CERCLA/RCRA corrective action) containing less than 1% total FOU1-FOU5 solvent constituent (268.30) ☐
- Other, specify (268.4, 268.5, 268.6, 268.31, 268.44) ☐

3. Has the facility used dilution of a restricted waste as a substitute for adequate treatment to achieve compliance (268.3)?

yes ☐ no ☒

4. List facilities to which off-site shipments of restricted wastes have been sent and/or from which shipments have been received.

a. Rinco Industries
b.

B. GENERATOR REQUIREMENTS

1. Generator has adequately tested his wastes using the TCLP, or applied knowledge, or both. (268.7(a))..... ☒
2. Generator has determined the appropriate treatment standards for his restricted wastes. (268.7 and Subpart D)..... ☒
3. The generator is not sending restricted waste to a land disposal facility for direct land disposal without treatment..... ☒
4. a. If restricted wastes require treatment prior to land disposal, then the generator has provided notification to the treatment facility with each off-site shipment. (268.7(a))..... ☒
- b. If restricted wastes do not require treatment prior to land disposal, then the generator has provided a notification and certification to the LDF that the wastes meet all applicable treatment standards and prohibitions (268.7(a))..... ☒
- Certifications properly worded..... ☒
5. If the generator's restricted waste is subject to any exemptions or extensions, then the generator has sent notices with each shipment to the LDF stating the waste is exempt. (268.7(a))..... ☒

1. The facility is not sending restricted waste to a land disposal facility for direct land disposal without treatment..... ☒
2. The treatment facility has adequately tested its treatment residues using TCLP, or applied knowledge, or both to determine whether or not they meet the applicable treatment standards specified in 268.41 (268.7(b))..... ☒
3. The facility has modified its waste analysis plan to include the additional testing requirements of 268.7, referenced in 264.13 and 265.13..... ☒
4. a. If the waste treatment residues do not meet applicable treatment standards or prohibitions, and are sent to another treatment facility prior to land disposal, then the facility complied with the generator notification requirement of 268.7(a). (268.7(b))..... ☒
- b. If the treatment residue does not require further treatment prior to land disposal, then the facility submitted to the LDF with each shipment of waste residue a certification that the waste is in compliance with applicable treatment standards. (268.7(b))..... ☒
- Certifications properly worded..... ☒
5. The facility's written operating record has been modified, and now includes the documentation required by 264.73(b)(3)(10)(11)(12) or 265.73(b)(3)(8)(9)(10)..... ☒
6. If the facility has stored restricted wastes for greater than one year, then it can satisfactorily demonstrate that the storage has been for the purpose of accumulating an amount necessary to facilitate proper recovery, treatment or disposal (268.50)..... ☒
7. If the treatment facility is permitted, it has made the necessary minor modifications to its permit to allow it to treat restricted wastes not previously specified in the permit (270.42(1))..... ☒

D. LAND DISPOSAL FACILITY REQUIREMENTS

1. The facility is not land disposing restricted wastes..... ☒
2. The land disposal facility has records of notifications and certifications submitted by all applicable generators and storage and treatment facilities for each shipment of waste or waste treatment residue accepted for land disposal. (268.7(c))..... ☒
3. The LDF has modified its waste analysis plan in accordance with the additional requirement of 268.7, referenced in 264.13 and 265.13..... ☒
4. The LDF has adequately tested the wastes received using TCLP, applied knowledge, or both. (268.7(c))..... ☒
5. The facility's written operating record has been modified, and now includes the documentation required by 264.73(b)(3)(10)(13)(14) or 265.73(b)(3)(8)(11)(12)..... ☒

COMMENTS: Facility is removing butyl alcohol from solvent solution

Please mark boxes as shown (☒) in compliance (☐) in violation

Inspector's Signature: Dan Bennett

Title: Environmental Specialist

Office: SLRO

SMALL QUANTITY GENERATOR

Form SQG-INSP

(9-19-89)

Page 1 of 3

INSPECTION RECORD AND CHECKLIST

Name of Facility Ray Schumann & Assoc.Date June 25, 1990Address 1347 January Ave.ID #'s 04255
MO0009738147St. Louis MO 63110Phone # 314/645-8700Facility Representative James SchumannTitle Plant ManagerNo. of employees 20No. of years at this location 10

Provide a brief description of the facility's operations and plant, including the size and content of any tanks: Manufactures photo-sensitive polymer plates for printing operations. Custom images are impressed on plates by exposure to light. Hazardous waste is generated by cleaning non-exposed surfaces with a perchloroethylene/butyl alcohol solution.

List the waste generated:

	Waste	lb or kg/mo.	Waste ID	Disposition
1)	<u>Perchloroethylene/butyl alcohol</u>	<u>250 kg</u>	<u>F002/F003</u>	<u>Energy Recovery</u>
2)				
3)				
4)				
5)				
6)				

SQG TANKS (Walk-Through, only)COMMENTS:

- ☐ Uncovered tanks have 2 ft. freeboard unless containment system is in place that holds an equal volume as the freeboard 265.201(b)(3)
- ☐ Continuously fed tanks equipped with a feed cut-off system or a by pass system 265.201(b)(4)
- ☐ Waste and/or treatment method is compatible with tank 265.201(b)(2)
- ☐ Ignitable or reactive wastes rendered safe/handled properly-265.201(e)(1)/(f)
- ☐ Ignitable or reactive wastes in covered tanks treated/stored in accordance with NFPA's buffer zone requirements-265.201(e)(2)
- ☐ Volatiles with vapor pressure > 78mm Hg @ 25 C not placed in open tanks-5.262(2)(C)2, D, I
- ☐ Inspection of discharge control equipment/monitoring data/freeboard/leaks/corrosion/etc. each operating day-265.201(c)1/2/3/4
- ☐ Weekly inspection of confinement structure, construction materials, and general area-265.201(c)5
- ☐ Wastes and residues removed, including equipment, and handled properly upon closure-265.201(d)

RECEIVED

JUL 09 1990

WASTE M.
MISSOURI
NAT.

SMALL QUANTITY GENERATOR CHECKLIST

RECORDS INSPECTIONCOMMENTS:GENERAL

- (✓) Registered as a HW Generator-260.380(1)(1) RSMo
- (✓) Utilizes authorized HW TSD, or RR facility-260.380(1)(7) RSMo
- (✓) Facility does not operate as an TSD-260.390(1) RSMo
- (✓) Facility determines if waste = hazardous - 262.11

waste is perch/alcohol blend. New products are being tried to reduce/eliminate alcohol

WASTE OIL 10 CFR 25-11.010

- () Registered as waste oil generator if gen./accum. 220 lb/mo-11.010(2)(A)
- () Written waste oil contract maintained-11.010(4)(A)
- () Waste oil properly stored, transported and disposed of-11.010(1)(D)
- () RR cert. for energy recovery or reclamation on-site-9.010

MANIFESTS 10 CFR 25-5.262(2)(B) & 40 CFR 262.20

- (✓) Facility uses manifest system-260.380 RSMo, 5.262(2)(B)
- (✓) Records maintained for a 3 year period-262.40(a)
- (✓) Generator's MO and EPA I.D. Numbers-5.262(2)(B), 262.12
- (✓) Manifest filled out in accordance with instructions - 262.20, 5.262(2)(B)1
- (✓) Manifest document, ID, & consecutive shipment numbers - 5.262(2)(B)2,A
- (✓) Generator's name, address, phone # - 262.20
- (✓) All transporter's names, phone #, MO and EPA I.D. #'s 5.262(2)(B)2, 262.20
- (✓) Designated facility name, address, phone, MO and EPA I.D. #, DOT shipping name, Hazard Class and I.D. # (AQ-if required)-262.20/49 CFR 172
- (✓) Containers, Quantity and Unit wt/vol being shipped properly designated-262.20
- (✓) Proper certification - 262.20
- (✓) Manifest properly signed and dated-262.20
- (✓) Out of state manifests have all required MO information 5.262(2)(B)4,A
- (✓) No manifest continuation sheets are used-5.262(2)(B)1
- (✓) Manifest returned within 35 days-5.262(2)(B)6,B or exception generator report submitted within 45 days-5.262(2)(D)2,C; 262.42(b)
- (✓) Completed Manifests sent to DNR QTRLY-5.262(2)(B)6,A
- (✓) Summary Manifest Reports sent to DNR QTRLY-5.262(2)(D)1
- (✓) Waste reclaimed under a contractual agreement (type, frequency, and shipping vehicle ownership)-262.20(e)(1)
- (✓) Generator maintains a copy of the contractual agreement onsite-262.20(e)(2)
- (✓) Proper "Land-Ban" notification/certification, (EPA HW #, treatment standards, manifest #, waste analysis data, etc.) sent with manifests and retained on-site, - reference 268.7

F

PREPAREDNESS AND PREVENTION-265 Subpart C & 262.34(d)

- (✓) Arrangements with local emergency agencies-265.37
- (✓) Emergency coordinator(s) on premise or on call-262.34(d)

PRETRANSPORT, CONTAINERIZATION, AND STORAGE-5.262(2)(C)1, 262.34COMMENTS:

- (4) Waste packaged/labeled/marked per DOT//during entire on-site storage period-262.30/.31/.32//5.262(2)(C)
- (7) Date of accumulation marked on containers-262.34(a)(2)
- (4) Placards available for use by transporters-262.33
- (4) Storage does not exceed 180 days (270 days if transported >200 miles) or exceed 13,200 lb. in total - 262.34
- (NA) If any combination of waste is generated or accumulated that = 1000kg, then CG standards apply-5.262(2)(C)2 (contingency and p.t. plan, containment, etc.), except for storage times. Do LUG chist.
- (4) Facility inspected and maintained (weekly)-265.174
- (7) Daily inspection of loading/unloading area (when in use) 5.262(2)(C)2.A.(II)
- (4) Containers in good condition and inspected-5.262(2)(C)A; 265.171/174
- (4) Containers closed tight in storage-265.173(a)
- (NA) Containers storing incompatible waste separated or protected from each other-265.177
- (4) Adequate aisle space is available-265.35
- (4) Containers of ignitable or reactive waste stored >50 feet from property line (or have a variance)-265.176
- (4) "No Smoking" signs conspicuously placed by ignitable or reactive wastes-5.262(2)(C)2.D.(II)
- (4) Containers protected from contact with accumulated liquids 5.262(2)(C)2.B

SATELLITE ACCUMULATION-5.262(2)(C)3 & 262.34(c)

- [] Stored in satellite areas less than 1 year
- [] Container marked identifying contents and beginning date
- [] Containers kept closed/compatible/good condition
- [] Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes)
- [] Satellite containers go to storage within 3 days of filling 262.34(c)

PREPAREDNESS & PREVENTION and EMERGENCY PROCEDURES-265 Subpart C. 262.34(d)

- (7) Emergency coordinator's name and phone number posted near phone-262.34(d)
- (7) Device in the hazardous waste operation area capable of summoning emergency assistance-265.34, 265.32(a)
- (4) Adequate and proper spill control, decontamination and safety equipment available (fire blankets, gas masks, SCBA, absorbents, etc) and properly tested and maintained-265.32
- (4) Adequate water supply for fire control equipment-265.32(d)
- (4) Communication and emergency equipment tested and maintained 265.33
- (4) Telephone number of fire department posted near phone-262.34(d)
- (4) Location of fire extinguisher and spill control equipment posted near phone-262.34(d)
- (4) Employees familiar with waste handling and emergency procedures 262.34(d)
- (4) Facility operated and maintained to minimize the possibility of an emergency-5.262(2)(E), 265.31
- [] Place a check mark if in compliance, leave blank if not.
- [] This is a class 1 violation

INSPECTOR:

Dan Bennett

FACILITY REP.

SIGNATURE:

James Schumann

DATE:

June 25, 1990

TITLE:

Plant Manager

Name of Facility: Ray Schumann and Assoc.

Date: June 25, 1990

Address: 1347 January Ave
St. Louis MO 63110

RR #: 331 No. I.D. #: 04255 EPA I.D. #: MO0009738147

RR Classification: _____

Facility Representative: James Schumann

Title: Plant Manager

Facility Status: LQ Gen. No

SG Gen. yes

TSD NO

Trans. No

Is a copy of the certification maintained at the facility?

Yes X

No _____

Is this facility meeting the conditions of their certification?

Yes X

No _____

If no, please elaborate.

Have any major or minor changes been made in the resource recovery operation?

Yes _____

No X

Have the changes be approved?

NA

Yes _____

No _____

Are any major or minor changes planned?

Yes _____

No X

Describe these changes

List the wastes that are recovered (Indicate any land-ban wastes):

1. Perchloroethylene F002

3. _____

2. _____

4. _____

If applicable, is the facility in compliance with the land-ban regulations?

Yes X

No _____

Does the facility generate, market, or burn hazardous waste fuels?

Yes X

No _____

If yes, is the facility complying with the hazardous waste fuel regulations?

Yes X

No _____

Are wastes accepted from off-site sources?

Yes _____

No X

If yes, please complete Section A. If no, proceed to Section B.

A. MANIFESTS 10 CSR 25-9.010(1)(D)3.

E. ADDITIONAL OPERATING STANDARDS FOR R1 and R2 FACILITIES 10 CSR 25-9.010(1)(E)

1. Shipments from off-site sources manifested.....()
2. Manifests properly completed by the generator.....()
3. Has owner/operator properly dated and signed manifests.....()
4. Generator's manifest copy returned within 30 days.....()
5. Manifest discrepancies noted and actions taken to resolve them.....()
6. Facility maintains their manifest copies for 3 years.....()
7. Time between generator and facility 10 days or less.....()

17. Owner/Operator following approved quality control plan.....()
18. Daily log of hazardous wastes received.....()
19. Daily log of inspections and maintenance.....()
20. Facility plans to continue operation for the next 6 months.....()
21. If not, facility has provided or will provide 30 days notice of closure or cessation of operation.....()
22. Approved waste analysis plan being followed.....()
23. Records of analyses kept on file.....()

Please describe items such as parameters of analysis, % of shipment analyzed, results of analysis, etc.

B. RECORDKEEPING AND REPORTING 10 CSR 25-9.010(1)(D)4. & 5.

8. Facility maintains a complete written operating record in accordance with.....()
10 CSR 25-7.265(2)(E)1 and 40 CFR 264.73(b)(1) and (2).....()
9. Facility has submitted quarterly report from DNR-H&F-I.....()
10. Unmanifested shipments properly recorded.....NA
11. Facility constructed and operated according to plans.....()
12. If not, have modifications been approved.....NA

COMMENTS: _____

Please mark boxes as shown

☒ In compliance

☐ In violation

D. STORAGE 10 CSR 25-9.010(1)(D)6. & 7.

13. Storage in a secure enclosure.....()
14. Storage with proper waste confinement.....()
15. Underground tanks and impoundments constructed with a leak detection system.....NA
16. Describe storage of waste and product at the facility, condition of containers, amounts, labeling, segregation, spill prevention, housekeeping, term of storage, etc. _____

Inspector's Signature Dan Bennett

Title Environmental Specialist

Office SLRO